

✓

REVIEWED BY (GAECH)



Continued From Front

IV. CHARACTERIZATION OF SITE ACTIVITY							
Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.							
<input checked="" type="checkbox"/> A. TRANSPORTER	<input checked="" type="checkbox"/> B. STORER	<input checked="" type="checkbox"/> C. TREATER	<input checked="" type="checkbox"/> D. DISPOSER				
1. RAIL	1. PILE	1. FILTRATION	<input checked="" type="checkbox"/> 1. LANDFILL				
2. SHIP	<input checked="" type="checkbox"/> 2. SURFACE IMPOUNDMENT	2. INCINERATION	<input checked="" type="checkbox"/> 2. LANDFARM				
3. BARGE	<input checked="" type="checkbox"/> 3. DRUMS	3. VOLUME REDUCTION	3. OPEN DUMP				
4. TRUCK	<input checked="" type="checkbox"/> 4. TANK, ABOVE GROUND	4. RECYCLING/RECOVERY	4. SURFACE IMPOUNDMENT				
5. PIPELINE	5. TANK, BELOW GROUND	5. CHEM./PHYS. TREATMENT	5. MIGHTY DUMPING				
6. OTHER (specify):	6. OTHER (specify):	<input checked="" type="checkbox"/> 6. BIOLOGICAL TREATMENT	6. INCINERATION				
		7. WASTE OIL REPROCESSING	<input checked="" type="checkbox"/> 7. UNDERGROUND INJECTION				
		8. SOLVENT RECOVERY	8. OTHER (specify):				
		9. OTHER (specify):					
2. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED All process water and rainfall collected from the process area is collected in tanks or impoundments west of the plant for injection well disposal (photo 7). Injection wells are approximately 6000 ft. deep. Silt from raw water supply is disposed of in a landfill/landfarm south of plant (Photo 8). Construction debris is disposed of in a landfill/landfarm south of plant (Photo 8). Construction debris is disposed of in a landfill/landfarm south of plant (Photo 8).							
V. WASTE RELATED INFORMATION							
A. WASTE TYPE							
<input type="checkbox"/> 1. UNKNOWN <input checked="" type="checkbox"/> 2. LIQUID <input checked="" type="checkbox"/> 3. SOLID <input checked="" type="checkbox"/> 4. SLUDGE <input type="checkbox"/> 5. GAS							
B. WASTE CHARACTERISTICS							
<input type="checkbox"/> 1. UNKNOWN <input checked="" type="checkbox"/> 2. CORROSIVE <input type="checkbox"/> 3. IGNITABLE <input type="checkbox"/> 4. RADIOACTIVE <input type="checkbox"/> 5. HIGHLY VOLATILE <input type="checkbox"/> 6. TOXIC <input type="checkbox"/> 7. REACTIVE <input type="checkbox"/> 8. INERT <input checked="" type="checkbox"/> 9. FLAMMABLE							
<input type="checkbox"/> 10. OTHER (specify):							
C. WASTE CATEGORIES							
1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.							
Yes, manifests							
2. Estimate the amount (specify unit of measure) of waste by category. Mark 'X' to indicate which wastes are present.							
a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER		
AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT		
None	None	None	24,000	None	60,000,000		
UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE		
			gal/month		gal/year		
<input checked="" type="checkbox"/> (1) PAINT, PIGMENTS	<input checked="" type="checkbox"/> (1) OILY WASTES	<input checked="" type="checkbox"/> (1) HALOGENATED SOLVENTS	<input checked="" type="checkbox"/> (1) ACIDS	<input checked="" type="checkbox"/> (1) FLYASH	<input checked="" type="checkbox"/> (1) LABORATORY PHARMACEUT.		
(2) METALS SLUDGES	(2) OTHER (specify):	(2) NON-HALOGENATED SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	(2) HOSPITAL		
(3) PCPW		(3) OTHER (specify):	(3) CAUSTICS	(3) MILLING/ MINE TAILINGS	(3) RADIOACTIVE		
(4) ALUMINUM SLUDGE			(4) PESTICIDES	(4) FERROUS SMELT. WASTES	(4) MUNICIPAL		
(5) OTHER (specify):			(5) DYES/INKS	(5) NON-FERROUS SMELT. WASTES	<input checked="" type="checkbox"/> (5) OTHER (specify):		
			(6) CYANIDE	(6) OTHER (specify):	Potentially contaminated water from plant.		
			(7) PHENOLS				
			(8) HALOGENS				
			(9) PCBs				
			(10) METALS				
			<input checked="" type="checkbox"/> (11) OTHER (specify):				
			3,4-dichloro phenol waste				

V. WASTE RELATED INFORMATION (continued)

3. LIST SUBSTANCES OF GREATEST CONCERN WHICH MAY BE ON THE SITE (place in descending order of hazard).

TCDD isomers toluene
 2,4-dichloro phenol 1,2,4-trichloro benzene
 dicamba
 terephthalic acid.

4. ADDITIONAL COMMENTS OR NARRATIVE DESCRIPTION OF SITUATION KNOWN OR REPORTED TO EXIST AT THE SITE.

Raw process water supply from Lower Neches Valley Authority, stored on site. All drinking water at site is bottled according to site representative.

VI. HAZARD DESCRIPTION

A. TYPE OF HAZARD	B. POTENTIAL HAZARD (mark 'X')	C. ALLEGED INCIDENT (mark 'X')	D. DATE OF INCIDENT (mo., day, yr.)	E. REMARKS
1. NO HAZARD				
2. HUMAN HEALTH	X			Potential TCDD contamination
3. NON-WORKER INJURY/EXPOSURE				
4. WORKER INJURY				
5. CONTAMINATION OF WATER SUPPLY				
6. CONTAMINATION OF FOOD CHAIN				
7. CONTAMINATION OF GROUND WATER				
8. CONTAMINATION OF SURFACE WATER				
9. DAMAGE TO FLORA/FAUNA				
10. FISH KILL		X	1974	Velsicol was fined for a fish kill in Rhodair Gully.
11. CONTAMINATION OF AIR				
12. NOTICEABLE ODORS				
13. CONTAMINATION OF SOIL				
14. PROPERTY DAMAGE				
15. FIRE OR EXPLOSION				
16. SPILLS/LEAKING CONTAINERS/ RUNOFF/STANDING LIQUIDS				
17. SEWER, STORM DRAIN PROBLEMS				
18. EROSION PROBLEMS				
19. INADEQUATE SECURITY				
20. INCOMPATIBLE WASTES				
21. MIDNIGHT DUMPING				
22. OTHER (specify):				

Continued From Front

VII. PERMIT INFORMATION

A. INDICATE ALL APPLICABLE PERMITS HELD BY THE SITE.

- ☒ 1. NPDES PERMIT ☒ 2. SPCC PLAN ☒ 3. STATE PERMIT (specify): Solid Waste Registration #30053
☒ 4. AIR PERMITS ☐ 5. LOCAL PERMIT ☐ 6. RCRA TRANSPORTER
☒ 7. RCRA STORER ☒ 8. RCRA TREATER ☒ 9. RCRA DISPOSER TXD067261412
☒ 10. OTHER (specify): Injection well permits WDW 125 & WDW 155

B. IN COMPLIANCE?

- ☒ 1. YES ☐ 2. NO ☐ 3. UNKNOWN

A. WITH RESPECT TO (list regulation name & number):

VIII. PAST REGULATORY ACTIONS

- ☐ A. NONE ☒ B. YES (summarize below)

Fine for fish kill 1974.

IX. INSPECTION ACTIVITY (past or on-going)

- ☐ A. NONE ☒ B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (month, day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION
Annual inspection			TDWR, TAQCB

X. REMEDIAL ACTIVITY (past or on-going)

- ☒ A. NONE ☐ B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (month, day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION

NOTE: Based on the information in Sections III through X, fill out the Preliminary Assessment (Section II) information on the first page of this form.

ATTACHMENT A

POTENTIAL HAZARDOUS WASTE SITE
IDENTIFICATION AND PRELIMINARY ASSESSMENT SUPPLEMENT SHEET

Instruction - This sheet is provided to give additional information in explanation of a question on the form T2070-2.

Corresponding
number on form

IV. E.

Additional Remark and/or Explanation

area adjacent to the lagoons. Dichloro phenol waste is stored in tanks or in drums until it is picked up for off site disposal. There is some chromium in the boiler blowdown which is deepwell injected.

A proposed sampling plan is attached.

SAMPLING PLAN

<u>Grid No.</u>	<u>No. Samples</u>
01 : Grassy area near lab building	1
02-05 : Grassy drainage ditches in process area	4
06 : Area adjacent to office	1
07-08 : Overgrown parking lot	2
09 : Area south of settling ponds	1
10-13 : Area east of plant and warehouse	4
14-19 : Area south of plant	6
35-40 : Area south of plant	6
22-28 : Area west of plant	7
20,21,41-43: Area west of plant	1*
32-34,44-46: Area west of plant	1*
29-31,47-49: Area west of plant	1*
50-55 : Area west of plant	1*
56-57,64-65: Area west of plant	1*
58-63 : Area west of plant	1*
68-71: Area west of plant	1*
66-67,72-74: Area west of plant	1*
75 : Parking north of office	1
76 : Parking south of office	1

Total Field Samples 42

All samples except those marked by an asterisk will be collected as eight-point composites with aliquots taken from uniformly distributed locations within the grid (one sample per grid). Those samples marked by an asterisk will be composited with two aliquots taken from each grid block listed for that sample; several grid blocks will make up one sample.

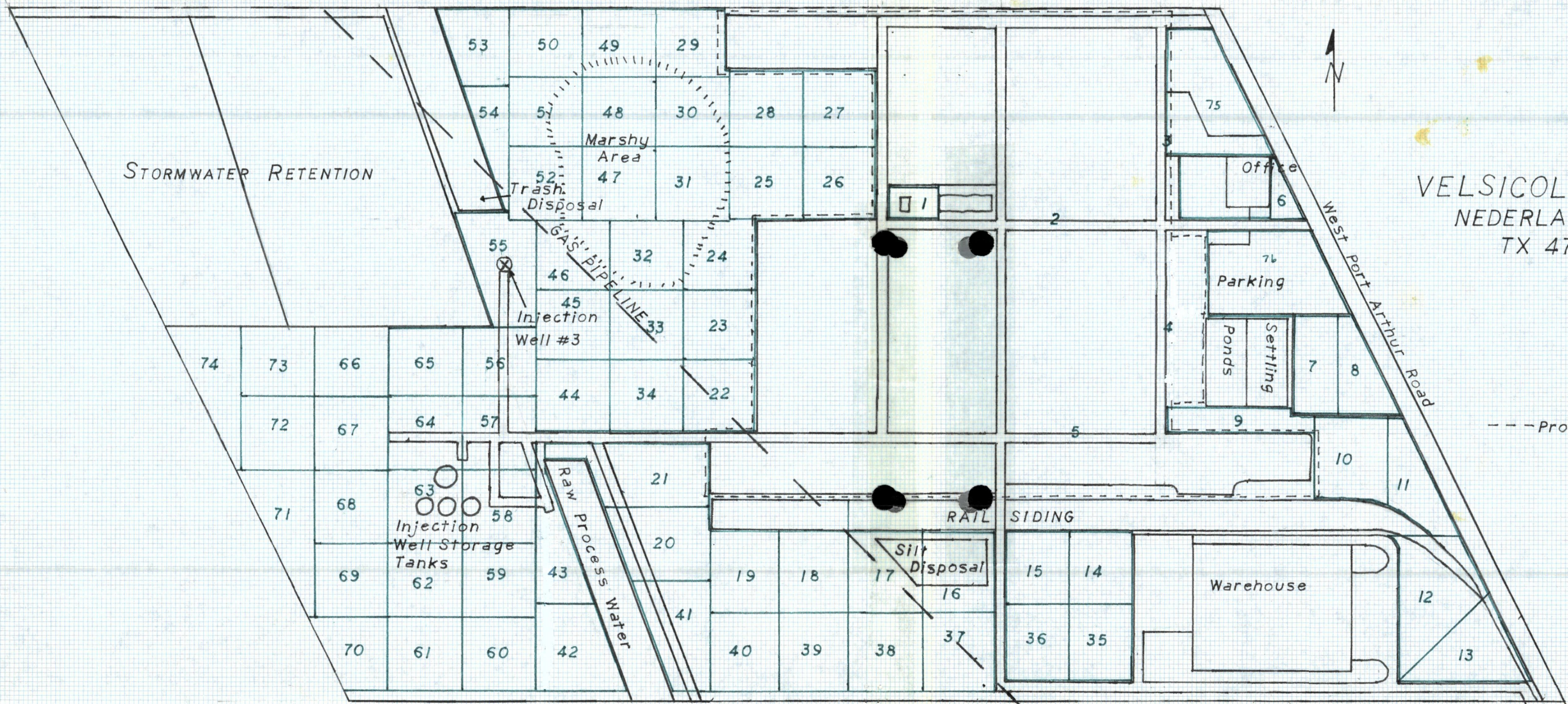
Aliquots will be of surface soils from depths of 0-6". Compositing will be done by homogenizing sample aliquots in a stainless steel pan with stainless steel spoons.

All roads within process area are paved. All process areas are concrete floored with retention walls. Grid 76 is an active employee parking lot, as is the western portion of grid 6. Grid 75 is an active construction parking lot. Grids 7 & 8 are located in an overgrown parking lot. Due to the compaction of these areas, it may be necessary to obtain a mounted auger to obtain soil samples from these areas. Background samples will be taken from each of four directions, approximately 1/2 to 1 mile from the site.

TOTAL SAMPLES

Onsite field samples	42
QA/QC duplicates	4
Blanks	2
Offsite background samples	4

Total 52



VELSICOL
NEDERLAND
TX 47

West Port Arthur Road

--- Proc